



March 22, 2023

Rachael Confair
Office of International Affairs, Trade and Commerce
NOAA Fisheries, US Department of Commerce
1315 East-West Highway (F/IS5)
Silver Spring, MD 20910

Request for 120-Day Extension of Public Comment Period for Proposed Rule for Revisions to the U.S. Seafood Import Monitoring Program (RIN 0648-BK85)

Dear Ms. Confair:

We submit this letter in regards to the National Marine Fisheries Service (NMFS) Proposed Rule for Revisions to the U.S. Seafood Import Monitoring Program (SIMP). NMFS published this proposed rule on December 28, 2022 without supplementary documentation. The accompanying Initial Regulatory Impact Review (IRIR) and Initial Regulatory Flexibility Analysis (IRFA) were added to the Federal Register website on March 20, 2023. The public comment period for this rule is currently scheduled to close on March 28, 2023.

While we welcome the publication of the IRFA and IRIR for this proposed rule, thorough review and comment on these documents is not possible in one week. The IRFA and IRIR include 32 pages of highly technical analysis on topics ranging from regulations and permitting to economic impact and global trade. Review of the proposed rule in the context of this new information will require additional time and may necessitate the compilation of new supporting documentation, additional analyses, and amendment of draft comment letters prepared before these documents were made available to the public.

We hope the NMFS will welcome a thorough review of these documents, as over 95% of the 2,000+ companies impacted by the SIMP are small businesses, and the seafood industry has learned a great deal regarding the cost and impact of SIMP implementation in the seven years since the program was finalized. **We strongly urge the NMFS to extend the comment period for RIN 0648-BK85 by an additional 120 days to allow for public review of the IRFA and IRIR.**

During the extended comment period, we encourage the NMFS to hold public webinars and listening sessions to explain the proposed rule and these reports to industry, respond to clarifying questions, and listen to verbal comments.

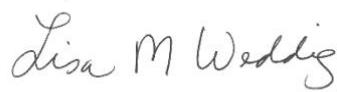
Goldfish Inc. and the National Fisheries Institute share the NMFS interest in protecting the U.S. market from illegally harvested and misrepresented seafood. We look forward to utilizing an extended public comment period to offer the most thoughtful input to this important and impactful rulemaking process possible.

Sincerely,



Celeste Leroux
CEO
Goldfish Inc.

www.goldfish.io



Lisa M. Weddig
Vice President, Regulatory and Technical
Affairs
National Fisheries Institute

aboutseafood.com